

Exhibit 2

Excerpt of the Deposition of Tobias Woolridge, dated January 25,
2024

Filed Under Seal

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

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4
5 EVERETT BLOOM, an individual on
6 behalf of himself, the general
7 public, and those similarly
8 situated,

9 Plaintiff,

10 vs.

Case No.:

2:22-cv-00412-RFB-BNW

11 ZUFFA, LLC,

12 Defendants.

**HIGHLY
CONFIDENTIAL**

13 *** HIGHLY CONFIDENTIAL ***
14 Remote Deposition Of
15 TOBIAS WOOLDRIDGE
16 Thursday, January 25, 2024

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CERTIFIED COPY

STENOGRAPHICALLY REPORTED
BY: DEBORAH FUQUA, CSR #12948
CERTIFIED STENOGRAPHIC REPORTER

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11/11/2016

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□ □ □ □ □

[illegible]

The image consists of a single, uniform black rectangle covering the entire area. There are no discernible features, text, or patterns.

1

[REDACTED]

[REDACTED]

1

[REDACTED]

17 ATTORNEY PATEK: Q. Okay. So when the Pixel
18 event data is received, it has the integer -- well,
19 assuming that the c_user cookie was transmitted as part
20 of it, it has the integer value of the Facebook ID
21 present in the Pixel event data, correct?

22 ATTORNEY RABBANI: Objection to form.

23 THE WITNESS: I don't know if I would
24 characterize the c_user cookie as part of the Pixel
25 event data necessarily.

11/11/2016

████████████████████

□ □ □ □ □

11/11/2016

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A series of 20 horizontal black bars of varying lengths, stacked vertically, representing redacted text. The bars are of different widths and are positioned at irregular intervals, suggesting a list or a series of lines of text that have been completely obscured. The bars are solid black and have no text or other markings on them.

[REDACTED]

1. *Journal of Management Studies*, 1997, 34, 1, 1-14.

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Q. I guess what I mean is Meta can use

14

information other than -- let's see. Let me think

15

about how to rephrase that.

16

Yeah. So I guess I'm asking about focusing on

17

the event data that's transmitted through the Meta

18

Pixel, even if the -- I guess to start over, Meta can

19

associate event data with a Facebook user even if that

20

event data does not include a Facebook ID, correct?

21

ATTORNEY EDELSTEIN: Form.

22

THE WITNESS: Meta can associate data to

23

Facebook user even if that event data was not

24

transmitted with a Facebook user ID.

25

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[REDACTED]

[REDACTED]

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HIGHLY CONFIDENTIAL/DEPO. OF TOBIAS WOOLDRIDGE - 01/25/24

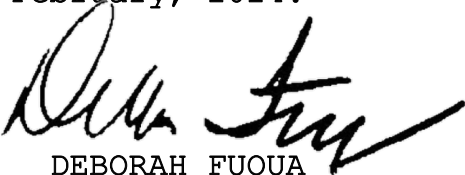
1 STATE OF CALIFORNIA)
2) ss.
3 COUNTY OF MARIN)

4 I, DEBORAH FUQUA, a Certified Shorthand
5 Reporter of the State of California, duly authorized to
6 administer oaths pursuant to Rule 30(b)(6) of the
7 Federal Rules of Civil Procedure, do hereby certify
8 that

9 TOBIAS WOOLDRIDGE,
10 the witness in the foregoing deposition, was by me duly
11 sworn to testify the truth, the whole truth, and
12 nothing but the truth in the within entitled cause;
13 that said testimony of said witness was reported by me,
14 a disinterested person, via a web conferencing platform
15 and was thereafter transcribed under my direction into
16 typewriting and is a true and correct transcription of
17 said proceedings.

18 I further certify that I am not of counsel or
19 attorney for either or any of the parties in the
20 foregoing deposition and caption named, nor in any way
21 interested in the outcome of the cause named in said
22 caption.

23 Dated the 8th day of February, 2024.

24 
25 DEBORAH FUQUA
CSR NO. 12948